



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SEP 17 2015

William T. Hall
Hall and Associates
1620 I Street, NW, Suite 701
Washington, D.C. 20006-4033

Re: Freedom of Information Request: EPA-R3-2015-008815, EPA-R3-2015-008817, EPA-R3-2015-008819, EPA-R3-2015-008831, EPA-R3-2015-008843, EPA-R3-2015-008848, EPA-R3-2015-008851, EPA-R3-2015-008853, EPA-R3-2015-008855, EPA-R3-2015-008860, EPA-R3-2015-008861

Dear Mr. Hall:

I am writing in regard to your Freedom of Information Act (FOIA) requests referenced above in which you requested various documents pertaining to EPA's development of the draft Total Phosphorus TMDL for the Wissahickon Creek Watershed. In those requests, you indicated that you were entitled to a waiver of fees. On July 16, 2015, EPA made an initial determination denying your fee waiver for the eleven requests. On August 21, 2015, and in response to your appeal of the July 16, 2015 decision, EPA made a final determination denying your requests for a fee waiver.

Pursuant to 40 CFR § 2.107(e), because we have determined that the cost to process your requests will be more than \$25.00 and more than the amount that you indicated that you would be willing to pay, we are obligated to notify you of the estimated cost of processing your requests. Since we have determined or estimated that the cost to process your requests will be more than \$250.00, we must receive your assurance of payment pursuant to 40 CFR § 2.107(j)(2). Upon receipt of your assurance of payment, we will complete the processing of your requests and forward the requested documents to you.

Because the eleven requests for information were made on the same day, are seeking materials likely kept in the same offices by the same record custodians, and are seeking materials related in subject matter, under EPA regulations at 40 CFR 2.107(i), EPA may presume that the multiple requests have been made to avoid fees. Pursuant to that regulation, and under the circumstances described above, EPA is aggregating the eleven requests into one request for purposes of calculating and providing one cost estimate covering all eleven requests.

Below is the estimated cost for processing your requests. These estimates include search and review time. The actual amount to process your requests may be more or less than the estimated amounts as shown below. When we have completed processing your requests, we will provide you with a bill which reflects the actual amount of time spent in processing your requests.



Office of Standards, Assessment and TMDLs

480 hours search/review time at \$28.00 per hour professional personnel = \$13,440.00

20 hours review at \$41.00 per managerial personnel = \$656.00

Office of Regional Counsel

54 hours review at \$28.00 per hour managerial personnel = \$1512.00

Water Protection Division

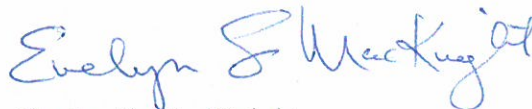
3 hours scanning time at \$16.00 per hour clerical personnel = \$48.00

Total: \$13,440.00+\$656.00+\$1512.00+\$48.00=\$15,656.00

If you would like to narrow the scope of your requests and thus reduce the cost incurred for documents responsive to them, please contact Ashley Toy at (215) 814-2774. If we have not heard from you by October 1, 2015, we will assume that you are no longer interested in pursuing the requests referenced herein and will consider the requests closed. If at a later date you are still interested in pursuing your requests, you may resubmit a FOIA request to FOIAonline or to the Freedom of Information Officer at the above address.

If you have any questions, please do not hesitate to contact Ashley Toy at (215) 814-2774.

Sincerely,



Evelyn S. MacKnight

Associate Director

Office of Standards, Assessment and TMDLs

cc: Rita Tate, FOIA Officer